

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

DEMOND MOORE,

Plaintiff,

v.

NEXT GENERATION HOSPITALITY
LLC.

Defendant

Case No. 1:22-cv-00548-MRB

JUDGE: BARRETT

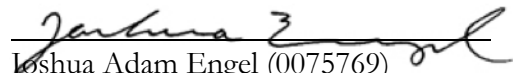
AFFIDAVIT OF JOSHUA ENGEL

Joshua A. Engel, after being first duly cautioned and sworn according to law, does hereby depose and state the following:

1. I am a member of the Bar of the State of Ohio and the Commonwealth of Massachusetts (inactive). I am also a member of the Bar of the U.S. Supreme Court, the First, Third, Fifth, Sixth, Seventh, Ninth and Eleventh Circuit Courts of Appeals, and the Federal District Courts for the Southern District of Ohio, the Northern District of Ohio, and the District of Massachusetts. I am a 1995 graduate of the Harvard University Law School.
2. I am submitting this Affidavit in support of the Motion, pursuant to 42 U.S.C. § 1988, 28 U.S.C. § 1927, and Local Rule 54, of Defendant Next Generation Hospitality, LLC, d/b/a Kings Inn & Suites, respectfully for Attorney's Fees.
3. My usual and customary rate is \$400.00/hour. Based on my experience and knowledge of the Ohio legal market, this rate is comparable to the rate charged by attorneys in Ohio with similar experience.

4. Attached to this Affidavit is a true and accurate copy of my Firm's billing records. These records are kept in the ordinary course of business. These records indicate that I billed 52.80 hours on this matter. This time was all necessary to defend against the Plaintiff's claims. This time is worth \$20,543.00. These records also indicate that Defendant incurred \$2,646.10 in expenses.

Signed under the pains and penalties of perjury this 3rd day of December 2024.


Joshua Adam Engel (0075769)


















CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served via the Court's ECF System this December 3, 2024 upon all counsel of record.

/s/ Joshua Engel
Joshua Adam Engel (0075769)

Activities Export

12/03/2024
9:15 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/05/2024		Review of Decision from Court; Email to client re:   	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.00h	\$400.00	-	\$400.00
04/12/2024		Continued revisions to MSJ Reply and Attn to Filing  	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	3.30h	\$400.00	-	\$1,320.00
04/11/2024		Continued Drafting Reply for MSJ  	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.20h	\$400.00	-	\$880.00
04/10/2024		Begining Drafting Reply for MSJ; research re:   Unbilled	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.80h	\$400.00	-	\$720.00
03/14/2024		Finalize MSJ and Attn to Filing  	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	3.50h	\$400.00	-	\$1,400.00
03/13/2024		Prep of Exhibits for MSJ and Attn to Filing	2022-02653/Kings Inn & Suites/Staybridge Suites	Joshua Engel	2.50h	\$400.00	-	\$1,000.00
						\$0.00	\$23,189.10	
						0.00h	52.80h	




Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		<div><div></div><div></div></div>	Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB					
03/12/2024		Continued Drafting MSJ <div><div></div><div></div></div>	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.60h	\$400.00	-	\$1,040.00
03/11/2024		Continued Drafting MSJ <div><div></div><div></div></div>	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	3.30h	\$400.00	-	\$1,320.00
03/05/2024		Conf. with Court <div><div></div><div></div></div>	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.50h	\$400.00	-	\$200.00
03/04/2024		Begin Drafting MSJ <div><div></div><div></div></div>	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.70h	\$400.00	-	\$1,080.00
09/11/2023		Revisions to Letter and Sending to Court <div><div></div><div></div></div>	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case	Joshua Engel	1.50h	\$385.00	-	\$577.50
							\$0.00	\$23,189.10
							0.00h	52.80h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/05/2023		Drafting Settlement Letter [REDACTED]	Number: 1:22-cv-00548-MRB	Joshua Engel	3.50h	\$385.00	-	\$1,347.50
08/01/2023		Veritext - Transcript (07-07-2023) - Paid EM Check 2057 [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Tonya Colwell	1.00	\$1,361.95	-	\$1,361.95
08/01/2023		Veritext - Transcript (07-06-2023) - Paid EM Check 2056 [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Tonya Colwell	1.00	\$882.15	-	\$882.15
07/07/2023		Plaintiff Deposition [REDACTED] 5	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.70h	\$385.00	-	\$1,039.50
07/06/2023		Deposition [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	3.30h	\$385.00	-	\$1,270.50
						\$0.00	\$23,189.10	
						0.00h	52.80h	

Activities Export






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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/05/2023		Depo. Prep ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.80h	\$385.00	-	\$693.00
06/29/2023		Prep for Depositions including Z/C with client and review of discovery for key docs ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.20h	\$385.00	-	\$847.00
06/16/2023		Email to Client ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.10h	\$385.00	-	\$38.50
06/15/2023		Prep for Status Conf with Court and SC with Court ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.70h	\$385.00	-	\$269.50
04/13/2023		T/C with opposing Counsel. Email to Chambers ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.50h	\$375.00	-	\$187.50
03/14/2023		Z/C with Client ██████████	2022-02653/Kings Inn & Suites/Staybridge Suites	Joshua Engel	0.60h	\$375.00	-	\$225.00

\$0.00 \$23,189.10
0.00h 52.80h


Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/06/2023		Prep for Status Conf. with Court; Status Conf. with Court [REDACTED]	Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB					
			2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.50h	\$375.00	-	\$187.50
01/31/2023		Continue Drafting Written Discovery to Plaintiff [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.80h	\$375.00	-	\$675.00
01/30/2023		Begining Drafting Written Discovery to Plaintiff [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.00h	\$375.00	-	\$375.00
12/15/2022		Drafting proposed Rule 26 Report [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.10h	\$375.00	-	\$412.50
10/19/2022		Drafting Answer [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case	Joshua Engel	1.80h	\$375.00	-	\$675.00
						\$0.00		\$23,189.10
						0.00h		52.80h



Activities Export

12/03/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Number: 1:22-cv-00548-MRB								
09/23/2022		Attn to Filing Notice of Removal [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.50h	\$375.00	-	\$187.50
09/23/2022		Removal Filing Fee [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.00	\$402.00	-	\$402.00
09/22/2022		Preparation of Removal Documents; Letter to Client; Return of Waiver of Summons [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.60h	\$375.00	-	\$600.00
09/09/2022		T/C with Counsel; T/C to Court re: CMC [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	0.30h	\$375.00	-	\$112.50
08/16/2022		Research re: [REDACTED] Letter to counsel [REDACTED]	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	2.60h	\$375.00	-	\$975.00
							\$0.00	\$23,189.10
							0.00h	52.80h

Activities Export

12/03/2024
9:15 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/12/2022		Review of Litigation Documents; Mtg with Client 	2022-02653/Kings Inn & Suites/Staybridge Suites Moore v. Next Generation Hospitality LLC Case Number: 1:22-cv-00548-MRB	Joshua Engel	1.30h	\$375.00	-	\$487.50
						\$0.00	\$0.00h	\$23,189.10
								52.80h